

BRAFMAN & ASSOCIATES, P.C.

ATTORNEYS AT LAW

767 THIRD AVENUE, 26TH FLOOR

NEW YORK, NEW YORK 10017

TELEPHONE: (212) 750-7800

FACSIMILE: (212) 750-3906

E-MAIL: ATTORNEYS@BRAFLAW.COM

BENJAMIN BRAFMAN

MARK M. BAKER
OF COUNSEL

MARC A. AGNIFILO
OF COUNSEL

ANDREA L. ZELLAN
JOSHUA D. KIRSHNER
JACOB KAPLAN
TENY R. GERAGOS
ADMITTED IN NY & CA
STUART GOLD

March 10, 2020

VIA ECF

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere, 18 Cr. 204 (NGG)

Dear Judge Garaufis:

We write regarding the Motion for New Trial (Dkt. 851) and the Memorandum in Support of the Motion (Dkt. 853) filed yesterday, March 9, 2020. Neil Glazer, attorney for the Plaintiffs in the civil action, has informed counsel that four people who he represented in dealings with the government are not Plaintiffs in the action. Accordingly, we withdraw footnote 7 on page 6, where counsel states “there is every reason to believe they may be plaintiffs.” See Dkt. 853 at n. 7. Glazer confirmed that they are not Plaintiffs and therefore, we remove that statement from our filing. We attach an amended filing redacting footnote 7.

Thank you for your continued consideration in this matter.

Respectfully submitted,

/s/

Marc A. Agnifilo, Esq., *Of Counsel*
Teny R. Geragos, Esq.

cc: Counsel for the government (via ECF)